

Samuel P. Krone  
Wyoming State Bar No. 6-3534  
Krone Law, LLC  
P.O. Box 2481  
Cody, Wyoming 82414  
307-578-6721

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT COURT**

**UNITED STATES OF AMERICA,)**

Plaintiff,

**vs.**

**RANDALL BAILEY,**

Defendant.

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**Criminal No. 25-MJ-35-SWS**

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**UNOPPOSED MOTION TO TOLL GRAND JURY PRESENTATION**

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The Defendant, by and through his attorney of record, Samuel P. Krone, Krone Law, LLC, hereby request a tolling of grand jury presentment pursuant to 18 U.S.C. § 3161(h)(7)(A). The United States, represented by its attorney, Paige Hammer, Assistant United States Attorney, consents to this Motion and accompanying Proposed Order.

As represented by the Defendant's signature below, the Defendant, Randall Bailey, states as follows:

1. I am the Defendant in this criminal proceeding, and I am represented by Samuel P. Krone.

2. I understand that pursuant to 18 U.S.C. § 3161 (b), I have the right to have my case presented to a grand jury within thirty (30) days of my arrest, or, if no grand jury has been in session during such thirty-day period, the period of time for filing of the indictment shall be extended an additional thirty days.
3. I submit this request to toll grand jury presentment pursuant to 18 U.S.C. § 3161(h)(7)(A) for a period not to exceed 75 days from the date of the granting of the motion. I make this request because I am negotiating with the United States to resolve this case. The United States is in the process of sending out complete discovery. I need the additional time to review all discovery, consider whether any further investigation is needed, and/or negotiate a possible resolution. I further request that an Order be entered providing that this time period shall be tolled and excluded from the speedy indictment time computation pursuant to 18 U.S.C. § 3161(h)(7)(A).
4. I make this request knowingly and voluntarily and after consultation with counsel. If I cannot reach an agreement with the United States Attorney's Office, I understand that my case will be presented to the grand jury at a later date, consistent with this waiver.

DATED the 14 day of MAY, 2025.

By: 

RANDALL BAILEY  
Defendant

By: /s/ Sam Krone 

SAMUEL P. KRONE  
Attorney for Mr. Bailey